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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

DEC 2 1 2011

Christen Craig Environmental Scientist 499 Col. Eileen Collins Blvd. Syracuse, NY 13212

Dear Ms. Craig:

The Environmental Protection Agency (EPA) has reviewed your letter of November 22, 2011 stating that C&S Engineers, Inc. on behalf of Chenango County is preparing a Federal Aviation Administration (FAA), Short Environmental Assessment Form for a proposed project at Lt. Warren Eaton Airport located in the Town of North Norwich, New York. The project will widen Runway 1-19 from 75 feet to 100 feet, replace the runway edge lighting system, re-grade the runway safety area along the sides of Runway 1, and remove critical tree obstacles within the Runway 01 Runway End Siting Surface and the Precision Approach Path Indicator's Obstacle Clearance Surface. Your letter requested that EPA provide comments or information regarding possible impacts to several listed categories. EPA does not have specific information on this location. EPA does recommend that you contact the U.S. Fish and Wildlife Service to consult on any endangered species impacts. Also enclosed is a list of resources, "U.S. EPA Region 2, Green Recommendations" that can assist you in greening this and future projects.

EPA commends Chenango County on its decision to re-plant trees removed off-airport and within St. Paul Cemetery. This regrowth of native trees and shrubs will mitigate habitat loss, and maintain the carbon sequestration ability of the area. Scientific evidence points to the importance of trees in slowing climate change.

Thank you for the opportunity to comment. Should you have any questions or need additional information, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely yours,

Grace Musumeci, Chief

Environmental Review Section

Enclosure

cc: Marie Jenet, FAA

U.S. EPA Region 2 Green Recommendations¹

To the maximum extent possible, projects are encouraged to use local and/or recycled materials; to recycle materials generated onsite; and to utilize low emissions technology and fuels. Further, they should use, to the extent feasible, renewable energy (including, but not limited to solar, wind, geothermal, biogas, and biomass) and energy efficient technology in the design, construction, and operation of transportation, building, and infrastructure projects.

• ENERGY STAR/Multi-media green building and land design practices

Require green building practices which have multi-media benefits, including energy efficiency, water conservation (see WaterSense below), and healthy indoor air quality. Apply building rating systems and no-cost online tools and guides, such as ENERGY STAR, Portfolio Manager, Target Finder, Indoor Air Quality Package, and WaterSense for building construction. Third party high-bar, multimedia standards should be required for building construction and land design (LEED and Sustainable Sites Initiative, Collaborative for High Performance Schools (CHPS), or local equivalent).

U.S. Green Building Council (USGBC) LEED Programs and Guides: http://www.usgbc.org/programs

ENERGY STAR home page: http://www.energystar.gov

ENERGY STAR Target Finder (no-cost online tool to set energy performance targets):

http://www.energystar.gov/targetfinder Indoor Air Quality: http://www.epa.gov/iaq

WaterSense - Encourage water conservation in building construction

Promote the use of water-efficient products to be used in new building construction through the use of WaterSense-labeled products and the use of contractors certified through a WaterSense-labeled program. Water-efficient landscape design and wise irrigation tips are also included in WaterSense. http://www.epa.gov/watersense/

Green building for U.S. Federal Agency Projects

The Federal Green Construction Guide for Specifiers includes helpful information for procuring green building products and construction/renovation services within the Federal government: http://www.wbdg.org/design/greenspec.php

Ensure environmentally preferable purchasing

Promote markets for environmentally preferable products by referencing EPA's multi-attribute Environmentally Preferable Purchasing guidance. Products and services include: Building and Construction, Carpets, Cleaning, Electronics, Fleets, Food Services, Landscaping, Meetings and Conferences, Office Supplies, and Paper.

http://www.epa.gov/epp

Purchase 'green' electronics, and measure their benefits

Require the purchase of desktop computers, monitors, and laptops that are registered as Silver or Gold products with EPEAT, the Electronics Product Environmental Assessment Tool (<u>www.epeat.net</u>). Products registered with EPEAT use less energy, are easier to recycle, and can be more easily upgraded than non-registered products. Energy savings, CO₂ emission reductions, and other environmental benefits achieved by

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¹ "Green" here means environmentally sound practices in general and is not equivalent to the specific "green infrastructure" requirements in the American Recovery and Reinvestment Act (ARRA). Please note that this list is not meant to be all inclusive.

the purchase, use and recycling of EPEAT-registered products can be quantified using the Electronics Environmental Benefits Calculator:

http://eerc.ra.utk.edu/cepet/eebc/eebc.html

Additional information: http://www.energystar.gov/index.efm?e=products.pr_find_es_products

• Encourage Low Impact Development to help manage storm water

Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage storm water as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat storm water as a resource rather than a waste product.

Implement site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the building site with regard to the temperature, rate, volume, and duration of flow.

http://www.epa.gov/nps/lid/

http://cfpub.epa.gov/npdes/home.cfm?program_id=298

Encourage sustainable storm water management at building sites on Brownfields

Consider designs for storm water management on compacted, contaminated soils in dense urban areas: http://epa.gov/brownfields/tools/swdp0408.pdf

• Alternative and Renewable Energy

The Department of Energy's "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy:

http://apps3.cere.energy.gov/greenpower/buying/buying/power.shtml?state=NJ

• Ensure Clean Diesel practices

Implement diesel controls, cleaner fuel, and cleaner construction practices for all on- and off-road equipment used for transportation, soil movement, or other construction activities, including:

- Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits;
- Use of ultra low sulfur diesel fuel in nonroad applications; and
- Use of the cleanest engines either through add-on control technologies like diesel particulate filters and diesel oxidation catalysts, repowers, or newer, cleaner equipment.

Encourage entities to consider adopting contract specifications requiring advanced pollution controls and clean fuels. A model spec is online at (applies to both on and non-road engines):

http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf

Additional Information: http://www.epa.gov/diesel/construction/contract-lang.htm

"A How To Guide for Diesel Engine Retrofits in the Construction Industry":

http://www.mass.gov/dep/air/diesel/conretro.pdf

• Promote the use of recycled materials in highway and construction projects

Many industrial and construction byproducts are available for use in road or infrastructure construction. Use of these materials can save money and reduce environmental impact. The Recycled Materials Resource Center has developed user guidelines for many recycled materials and compiled existing national specifications.

http://www.recycledmaterials.org/tools/uguidelines/index.asp http://www.recycledmaterials.org/tools/uguidelines/standards.asp http://www.fhwa.dot.gov/pavement/recycling/rectools.cfm http://www.epa.gov/osw/conserve/rrr/imr/index.htm

Encourage cost-efficient, environmentally friendly landscaping

EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. Designed to help preserve natural resources and prevent waste and pollution, GreenScapes encourages companies, government agencies, other entities, and homeowners to make more holistic decisions regarding waste generation and disposal and the associated impacts on land, water, air, and energy use. http://www.epa.gov/osw/conserve/rrr/greenscapes/index.htm

• Incorporate onsite energy generation and energy efficient equipment upgrades into projects at drinking water and wastewater treatment facilities

Promote the use of captured biogas in combined heat and power systems and/or renewable energy (wind, solar, etc.) to generate energy for use onsite as well as upgrades to more energy efficient equipment (pumps, motors, etc.).

http://water.epa.gov/infrastructure/sustain/goinggreen.cfm http://www.epa.gov/region9/waterinfrastructure/howto.html

• Incorporate greener practices into remediation of contaminated sites

Encourage or incentivize the use of greener remediation practices, including designing treatment systems with optimum energy efficiency; use of passive energy technologies such as bioremediation and phytoremediation; use of renewable energy to meet power demands of energy-intensive treatment systems or auxiliary equipment; use of cleaner fuels, machinery, and vehicles; use of native plant species; and minimizing waste and water use.

http://cluin.org/greenremediation/index.cfm

• Encourage land development in Brownfield and infill sites

Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. These sites are often "infrastructure-ready," eliminating the need to build new roads and utility lines which are necessary in undeveloped land. http://www.epa.gov/brownfields/

Encourage use of Smart Growth and transit oriented development principles

Smart Growth and transit oriented development (TOD) principles help preserve natural lands and critical environmental areas, and protect water and air quality by encouraging developments that are mixed-use, walkable and located near public transit. Encourage use of bicycling with bike commuter parking, storage, and changing facilities. Encourage carpooling or alternative vehicles with preferable parking spaces or electric vehicle plug in spots.

http://www.epa.gov/smartgrowth

• Use the Integrated Design process on building developments

Current procurement practices tend to separate out development into distinct stages that discourage communication across the project lifecycle. The Integrated Design process calls for the active and continuing engagement of all stakeholders throughout the building design, development, and construction phases including the owners, architects, engineers, building department officials, and other professionals. This process can help create a higher performing building at lower costs, allows for various building systems to work together, eliminates redundancy from overdesign and unnecessary capacity, and minimizes change orders during the construction phase. We encourage revising procurement practices so that it can use the Integrated Design process.

http://www.wbdg.org/design/engage_process.php